

MEMO TO PHASE III RECORD

Date: April 28, 2004

RE: Analysis of 25% Cooling Water Usage Threshold for Phase III Facilities

This memo describes an analysis of cooling water usage at Phase III facilities under a variety of scenarios.

Historical Analyses in Phase III

On September 2003, EPA removed 11 facilities from the Phase III master list due to the withdrawal of less than 25% of intake water being apportioned to cooling water. These deletions were the result of a change in the interpretation of actual intake flow (AIF) to include flow data from 1996 to 1998 (3-year average) instead of only 1998 data (1-year average).

Phase III Analyses

The analyses of various scenarios for measuring compliance with the 25% threshold were performed for Phase III facilities. The first scenario uses a facility-level analysis of cooling water usage, where the total intake flow of a facility (and all of its intakes) is considered as a whole. The second uses an intake-level analysis whereby if one intake exceeds 25% usage, then the entire facility is considered to be in scope. The third scenario is purely at an intake level, as all out of scope intakes are excluded.

The results of the analysis is as follows:

Scenario	No. of Facilities/Intakes >25% ^{1, 3}	Total DIF of Facilities/Intakes >25% (MGD) ^{2, 3}
1	236 facilities in scope	19,112
2	241 facilities in scope	19,421
3	317 intakes in scope	18,443

1 A total of 299 facilities and 425 individual cooling water intake structures were reviewed.

2 The calculations of total flow exclude any flows associated with the hydroelectric intakes for two Phase III manufacturers, as these flows are likely to be excluded from consideration for 316(b).

3 The numbers of facilities and the intake flows reflect unweighted survey data.